

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION
MOBILE, ALBAMA**

Barbara Wilson
Pro Se
and

Lorenzo M. Wilson
Pro Se
Plaintiffs

Case No. 23-CV-354-TFM-MU
Demand Trial by Jury

V.

Sheree Johnson
Catrinna Long Perry,
John Ryan and
Elizabeth Watford
a.k.a. Aunt May
Jane Does 1 thru 4
Defendants

**CIVIL RIGHTS VIOLATIONS 42 U.S.C 1983, CONSPIRACY,
RACIAL DISCRIMINATION PUBLIC CORRUPTION AND
MALFEASANCE**

PRELIMINARY STATEMENT:

The Plaintiffs Barbara Wilson and Lorenzo M. Wilson brings this Civil Rights Complaint pursuant 42 U.S.C. 1983 and for Violation of their rights guaranteed under 1st, 5th and 14th Amendments of the United States Constitution and violation of State statutory rights against the above defendants. That at all

times material to this complaint the defendants were acting under the color of State law. This case arise out of the attempt by the defendants and each of them to sell heir property, 160 acres whose estimated market value is between \$800,000.00 and 1.6 million dollars. The defendants hopes to achieve this sale by a fraudulent deed, forged signatures, falsification of public and judicial records, stealing and destruction of Plaintiffs legal work.

JURISDICTION

1. Jurisdiction of this case is invoked pursuant to 28 U.S.C.A. 1343 in that it arises under 42 U.S.C.A. 1983 and under 28 U.S.C. 1331, the First Amendment U.S. Const. **RIGHT TO FREEDOM OF SPEECH AND THE RIGHT TO LAWFUL ACCESS TO OUR COURTS** and under the 5th Amendment U.S. Const. **RIGHT TO DUE PROCESS OF LAW** and under the 14th Amendment U.S. Const. **RIGHT TO EQUAL PROTECTION OF THE LAW AND DUE PROCESS OF LAW.**

2. Jurisdiction is also conferred upon this Court pursuant to 28 U.S.C.A. 1367 supplemental jurisdiction over any State law claims that may arise in the course of this case.

3. **Venue** is proper in this Court under 28 U.S.C.A. 1391(b) because the events that gave rise to Baraba Wilson and Lorenzo M. Wilson claims took place and are taking place in Greensboro, Alabama, which is in the Northern Division of the Federal Southern District of Alabama.

PARTIES:

4. Plaintiff, Barbara Wilson is the daughter of Robert L. Wilson, the grand daughter of Herman Wilson and the great grand daughter of William Wilson the original purchaser of the real property that is listed below and whose address is Barbara Wilson 2441 Liberty St. Beaumont, Texas 7702.

5. Plaintiff, Lorenzo M. Wilson is the son of Robert L. Wilson, the grandson of Herman Wilson and the great grandson of William Wilson whose address is Lorenzo M. Wilson 3014 Veterans Memorial Parkway, Tuscaloosa, Alabama 35404,

6. Defendant Sheree Johnson is an assistant Clerk for the Circuit Court of Hale County Alabama whose address is Sheree Johnson Hale County Courthouse 1001 Main St. Room 13 Greensboro, Alabama 36744. And whose is liable in this action for theft and intentional destruction of legal work and conspiracy with John Ryand and malfeasance.

7. Defendant Catrinna Long Perry is the Circuit Court Clerk for Hale County, Alabama whose address is Catrinna Long Perry Hale County Courthouse 1001 Main Street Room 13, Greensboro, Alabama 36744. As the Circuit Court Clerk for Hale County Alabama she is responsible for the supervision and training of her employees. She is responsible for lawful record keeping and for the safe keeping of Public legal documents and for upholding the 1st amendment rights for all citizens to use the Court of Hale County Alabama. She is liable in this cause of action for her failure to train and to supervise Sheree Johnson, and has otherwise engaged in malfeasance and nonfeasance with respect to her duties as Clerk.

8. John Ryan is an attorney for Elizabeth Watford who is the publisher and forger of a fraudulent deed for the real property listed in this complaint, and who has conspired with Sheree Johnson to violate the Civil Rights of Barbara Wilson, Lorenzo M. Wilson and all the heirs of William Wilson. Who operates as John Ryan P.O. 241 Greensboro, Ala. 36744.

9. Elizabeth Watford of 241 Gewin St. Akron, Al. 35441 is the aunt of the Plaintiffs Barbara Wilson and Lorenzo M. Wilson and who legally sold her interest in 2011 and is using a fraudulent deed with a forged signature.

10. Jane Does 1 thru 4 are female individuals who may have and or are assisting the defendants named in this complaint in the violation of the Civil Rights of the Plaintiffs, whose real names are unknown to the Plaintiffs at this time but will be added by amendment when known.

Subject real estate referred to in this case:

11. 6324 County Rd 36. (Lock 8) Akron, Alabama 35441 being 160 Acres purchased by William Wilson the great grand father of Barbara Wilson and Lorenzo M. Wilson.

Racial discrimination under the Color of State Law:

12. On April 13 2023 Lorenzo M. Wilson filed a civil complaint for libel and Slander against the defendant Elizabeth Watford a.k.a aunt May. Subject of the suit is a fraudulent deed and forged signature- Hale County, Alabama Circuit Court case #CV2023-10. 5 Months later - his case is being suppressed by the named defendants, by theft of and destruction of the legal work of the Lorenzo M. Wilson based upon his race being of African Acenstry. In particular the defendants Sheree Johnson assitant court clerk who is a white female and the Court Clerk Catrinna Perry who is a female American Negroe, stole and destroyed his motion requesting a ruling on a fake and fraudulent deed with a forged signature. The forged signature is suppose to be that of Natha Wilson (aunt of the Plaintiffs) a double stroke suffering from acute expressive aphasia (the ability to hear but not speak) where comprehension or the lack thereof may or may not exist. More importantly "IF YOU DON'T SIGN YOUR MOTHER'S NAME, TO THIS DEED I

WON'T TAKE YOUR MOTHER TO THE HOSPITAL ANYMORE, AND I WON'T BE ABLE TO HELP YOU WITH YOUR BABIES" Words of the defendant Elizabeth Watford.

The theft and destruction of the legal work of Lorenzo M. Wilson trying to expose this conduct, was done by defendants Sheree Johnson and Catrinna Perry under the color of State Law of Alabama. These actions by the defendants constitute Public Corruption and malfeasance by the Circuit Court Clerk and her assistant. See the attached exhibit A

13. The filing fee for LORENZO M. WILSON to sue one defendant in Hale County was \$306.00 plus \$100.00 for jury demand. The summon and complaint was required to be sent return receipt mailed by the clerk which is State law.

14. On July 11,2023 the defendant John Ryan attorney for Elizabeth Watford filed a petition to sale the 160 acres against 20 heirs of William Wilson, John Ryan as white attorney was allowed file a petition without one return of receipt. Also allowed to act as his own process servor and allowed to set his own filing fee of \$411.00 which is a third of what was legally

due. These illegal acts were done with the aid and assistance of defendants Sheree Johnson and Catrinna Perry under the Color of State Law to deprive the heirs of Williams Wilson of due process of law under 5th and 14th Amendments and the right to equal protection of the law under the 14th Amendment U.S. CONST. based on our African Ancestry. See attached Exhibit B.

15. The Plaintiffs Barbarba Wilson and Lorenzo M. Wilson further asserts that they and the other heirs of William Wilson are being denied equal protection of the law based on race as guaranteed under the 14th Amendment of U.S. Const. When there is a double standard in filing fee, one for whites and one for blacks. And when there is a double standard in the process of service.

CIVIL RIGHTS CONSPIRACY AND HOW IT WORKS

16. Based upon their investigation, their information and their belief, Barbara Wilson and Lorenzo M. Wilson allege that on or about July 11, 2023 defendants Sheree Johnson and John Ryan

entered into an agreement to give John Ryan an absolute advantage in litigation in the above mention civil cases by elimination of any adversial process and by using the office of the Circuit Clerk to violate the Civil Rights of Twenty Natural Born African American Citizens to wit:

(a) Allowing John Ryan to be his own process, by using regular mail, and were suppose to take his word for service. This conduct not only violate State law ARCP RULE 4(2)(B)(i) but it annihilate the 5th and 14th Amendment Rights of U.S. Const. to notice and due process of law guaranteed to Barbara Wilson and Lorenzo M. Wilson as Natural Born Citizens in the United States of America.

(b) In furtherance of their conspiracy Sheree Johnson did use her position as a public official to falsify Public Records to give the appearance of legal service to twenty (20) Natural Born African-American Citizens in violation Ala. Code 13A-10-12(a)

(1). When in fact not one return receipt was given or is on file.

(c) On July 21 2023 Lorenzo M. Wilson filed a motion to oppose the petition for sale. In furtherence of their conspiracy to deprive

the Plaintiffs of their right to freedom of speech and right to access to our Courts under the 1st Amendment U.S. CONST. the defendants Sheree Johnson and Catrinna Perry did steal and did destroy the legal pleadings of Lorenzo M. Wilson because it contain unfavorable speech against Sheree Johnson and John Ryan. See attached Exhibit C.

(d) In furtherance of their conspiracy the defendants Sheree Johnson and Catrinna Perry did on or about August 8, 2023 did published a false motion for deposition and did forge the signature of Barbara Wilson without her permission. See attached Exhibit D.

(e) In furtherance of their conspiracy to aid and assist John Ryan the defendants Sheree Johnson and Catrinna Perry did steal and destroy the Pleadings filed in case CV- 2023-0010 on July 10, 2023 Hale County Circuit Court. See attached Exhibit E.

17. Based upon the investigation, the information and belief of Barbara Wilson and Lorenzo M. Wilson they allege that the defendant Sheree Johnson and Catrinna Perry are being

financially compensated by John Ryan and or expect to be financially compensated by John Ryan in the sell of 160 acres valued between \$800,000.00 to \$1.6 million Dollars.

18. The above described actions of the defendants are Civil Rights Violation, betrayal of Public Trust, Malfeasance in Public Office and is by definition Public corruption. The actions of these defendants show a reckless disregard for both State and Federal Law and American Jurisprudence.

19. Based upon investigation and information of Barbara Wilson and Lorenzo M. Wilson they will prove at trial a long standing practice of Public Corruption with the Clerk's office and John Ryan.

Wherefore the above premise considered request the following relief :

1. Barbara Wilson request compensatory damage of 1.6 Million Dollars against the defendant Sheree Johnson in her official capacity as assistant Circuit Court Clerk for Hale County Al.
2. Barbara Wilson seek compensatory damage of 1.6 Million Dollars against the defendant Catrinna Perry in her official

capacity as Circuit Court Clerk for Hale County.

3. Barbara Wilson seeks compensatory damages of 1.6 Million Dollars against John Ryan.

4. Barbara Wilson seek compensatory damages to be determined by a Jury based upon evidence produced at trial against Elizabeth Watford.

5. Barbara Wilson seek Punitive and Exemplary damages in the maximum allowed by law against each named defendant individually based upon evidence at trial

6. Lorenzo M. Wilson seeks compensatory damages of 1.6 Million Dollars against Sheree Johnson in her official capacity

7. Lorenzo M. Wilson seeks compensatory in excess of 1.6 Million dollars against Catrinna Perry in her official capacity.

8. Lorenzo M. Wilson seeks compensatory damages in excess of 1.6 Million Dollars against the defendant John Ryan

9. Lorenzo M. Wilson seek compensatory damage in excess of 1.6 Million Dollars against Elizabeth Watford.

10. Lorenzo M. Wilson seek Punitive and Exemplary damages in the maximum allowed by law against each named defendant

individually based upon evidence at trial.

11. Barbara Wilson and Lorenzo M. Wilson seek declaratory Judgment stating that the defendants Catrinna Perry, Sheree Johnson, and John Ryan be permanently barred from holding any Federal Job or any Federal position of trust.

Sept. 18, 2023

Respectfully Submitted



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